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*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors**

- ☐ Affects PG& E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF KODY KLEBER IN  
SUPPORT OF REPLY IN SUPPORT OF  
MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
TO COMPEL PRODUCTION OF  
THIRD-PARTY CONTRACTOR  
DOCUMENTS**

Date: August 27, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 KODY D. L. KLEBER, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort  
3 Claimants (the “TCC”) of PG&E Corporation and Pacific Gas and Electric Company (the  
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Reply in Support of Motion of the Official  
6 Committee of Tort Claimants to Compel Production of Third Party Contractor Documents  
7 (“Motion”).

8 3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts  
9 set forth herein.

10 4. Attached hereto as EXHIBIT A is a true and correct copy of document bates-labeled  
11 PGE-BK-0000024456, Contract Work Authorization No. C8068 dated March 13, 2018, between  
12 Pacific Gas and Electric Company and Quanta Technology, LLC.

13 5. Attached hereto as EXHIBIT B is a true and correct copy of the is a true and correct  
14 copy of document bates-labeled PGE-BK-0000028237, Contract Work Authorization No.  
15 4400004292 dated January 8, 2014, between Pacific Gas and Electric Company and Burns &  
16 McDonnell Engineering Company, Inc.

17  
18 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States*  
19 *of America that the foregoing is true and correct to the best of my knowledge and belief.*  
20

21 Executed on August 26, 2019

/s/ Kody D.L. Kleber  
By: Kody D. L. Kleber  
Admitted Pro Hac Vice